

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
600 Montgomery Street, Suite 3100  
San Francisco, CA 94111-2806  
Telephone: 415.659.2600  
Facsimile: 415.659.2601  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
David J. Richardson (SBN 168592)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: drichardson@bakerlaw.com  
Email: lattard@bakerlaw.com

David B. Rivkin, Jr. (*pro hac vice*)  
BAKER & HOSTETLER LLP  
1050 Connecticut Ave., N.W., Suite 1100  
Washington, D.C. 20036  
Telephone: 202.861.1731  
Facsimile: 202.861.1783  
Email: drivkin@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**EX PARTE APPLICATION OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS PURSUANT TO B.L.R.  
9013-1(c) FOR ENTRY OF AN ORDER  
AUTHORIZING OVERSIZE BRIEFING  
OF REPLY IN SUPPORT OF OMNIBUS  
OBJECTION TO CLAIMS FILED BY  
CALIFORNIA GOVERNOR'S OFFICE  
OF EMERGENCY SERVICES**

Relates to Dkt. Nos. 5096, 5320 & 5743

The Official Committee of Tort Claimants (hereafter, the “**TCC**”), in the chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E Corporation and Pacific Gas and Electric Company (the “**Debtors**” or “**PG&E**”), by and through its undersigned counsel, hereby submits this Application (the “**Application**”) to the Court, pursuant to Rule 9013-1(c) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California (the “**Bankruptcy Local Rules**”), for entry of an order authorizing the TCC to file an oversize brief for its reply (the “**Reply Brief**”) in support of the TCC’s omnibus objection to the claims filed by California Governor’s Office of Emergency Services (“**Cal OES**”). In support of this Application, the TCC respectfully submits the Declaration of Lauren T. Attard (the “**Attard Decl.**”), filed contemporaneously herewith.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. JURISDICTION**

The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **II. BACKGROUND**

On December 12, 2019, the TCC filed an objection to Cal OES’s claims [Dkt. No. 5096] (“**Objection**”).

On January 9, 2020, the TCC filed a supplement to the Objection [Dkt. No. 5320].

On February 12, 2020, Cal OES filed its opposition to the TCC Objection [Dkt. No. 5743] (“**Opposition**”). This Opposition brief was 37 pages.

The TCC now seeks to file its Reply Brief in support of the Objection, which will address the arguments raised by Cal OES in its Opposition.

### **III. OVERSIZE BRIEFING FOR THE REPLY BRIEF IS WARRANTED**

Bankruptcy Local Rule 9013-1(c) provides that, “Unless the Court expressly orders otherwise, the initial and response memoranda of points and authorities shall not exceed 25 pages of text, and reply memorandum shall not exceed 15 pages of text.” B.L.R. 9013-1(c).

1 The TCC respectfully submits that cause exists for the TCC to exceed the 15-page limit for  
2 its Reply Brief. Although the TCC has limited the length of its briefing as much as possible, the  
3 numerosity of the issues presented in the Opposition and the importance of the Court's  
4 determination of the relief requested to the resolution of these Chapter 11 Cases have made it  
5 impracticable for the TCC to limit further the size of the Reply Brief.

6 **WHEREFORE**, the TCC requests entry of an order granting the relief requested herein  
7 and such other and further relief as the Court may deem just and appropriate.

8  
9 Dated: February 19, 2020

Respectfully submitted,

10  
11 BAKER & HOSTETLER LLP

12 By: /s/ Lauren T. Attard  
13 Lauren T. Attard

14 *Counsel to the Official Committee of Tort Claimants*  
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